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**From:** Houlihan, Damien  
**Sent:** Tue 9/29/2015 12:15:24 PM  
**Subject:** FW: draft Steam Electric Rule docs  
ROLL OUT Steam Electric 9.30.15.docx  
PRESS RELEASE Steam Electric 9.30.15.docx

FYI.

**From:** Webster, David  
**Sent:** Monday, September 28, 2015 5:30 PM  
**To:** Zobrist, Marcus <Zobrist.Marcus@epa.gov>; Houlihan, Damien  
<houlihan.damien@epa.gov>  
**Cc:** Moraff, Kenneth <Moraff.Ken@epa.gov>  
**Subject:** FW: draft Steam Electric Rule docs

Marcus, Damien,

Is there reason why PSNH Merrimack is not on the list of subject facilities in the attached Roll Out document? This looks like an unintended omission.

Ken,

PSNH Merrimack is subject to these new rules, and the upcoming Final Permit for PSNH Merrimack will be in accordance with these new Rules. A summary is below. The other R1 facility listed, Mt. Tom, is no longer operational, so these new rules will not apply.

DW

Merrimack Station in Bow, NH primarily burns coal and operates with an electrical output of 478 megawatts (MW). The facility currently utilizes a once-through cooling system designed to withdraw up to 287 million gallons per day (MGD) of water from the Hooksett Pool portion of the Merrimack River (85 MGD for Unit 1 and 202 for Unit 2) and then to discharge the heated water back to the river. Permitting issues include 1) the thermal discharge and the company's 316(a) variance request, 2) Cooling Water Intake Structures 316(b) requirements, and 3) effluent limits for a new New Flue Gas Desulfurization (FGD) Unit. The draft permit was released 9/30/2011. In 2014, EPA re-proposed a revision to the draft permit regarding the FGD requirements. A final permit is expected in FY2016 which will be in compliance with the new

316(b) Existing Facilities Rule and the new Steam Electric Power Plant Rule.

**From:** Moraff, Kenneth  
**Sent:** Monday, September 28, 2015 4:45 PM  
**To:** Webster, David <[Webster.David@epa.gov](mailto:Webster.David@epa.gov)>; Houlihan, Damien  
<[houlihan.damien@epa.gov](mailto:houlihan.damien@epa.gov)>  
**Cc:** Hamjian, Lynne <[Hamjian.Lynne@epa.gov](mailto:Hamjian.Lynne@epa.gov)>  
**Subject:** FW: draft Steam Electric Rule docs

Damien and Dave – see question below – do we have anything on this? Ken

**From:** Deegan, Dave  
**Sent:** Monday, September 28, 2015 4:43 PM  
**To:** Conroy, David <[Conroy.Dave@epa.gov](mailto:Conroy.Dave@epa.gov)>; McWilliams, Anne K.  
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**Subject:** FW: draft Steam Electric Rule docs

Looks like we have one plant – Mt. Tom in central MA – that is impacted. Do we have any internal talking points or Q&A material for this, in case needed?

Thanks!

Dave

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Dave Deegan

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**From:** Loop, Travis  
**Sent:** Monday, September 28, 2015 1:57 PM  
**To:** PADs and Alternates  
**Cc:** Purchia, Liz; Harrison, Melissa; Lee, Monica; Allen, Laura; Abrams, Dan  
**Subject:** draft Steam Electric Rule docs

PADS

We will announce the final Steam Electric Power Plant rule this Wednesday, Sept 30. Attached are draft documents – the press release and roll out plan. Please note the list of 134 facilities that will be impacted by this rule in the roll out doc, which are organized by state. Please let me know if you have any questions.

Here is what this is about:

The rule will reduce the discharge of toxic pollutants into America's waterways from steam electric power plants by 1.4 billion pounds annually, as well as reduce water withdrawal by 57 billion gallons per year.

Steam electric power plants account for about thirty percent of all toxic pollutants discharged into streams, rivers and lakes from permitted industrial facilities in the United States. These toxic pollutants include mercury, arsenic, lead, and selenium, which can cause neurological damage in children, lead to cancer, and damage the circulatory system, kidneys, and liver. Toxic metals also do not break down in the environment and can contaminate sediment in waterways and impact aquatic life and wildlife, including large-scale die-offs of fish. Due to their close proximity to these discharges and relatively high consumption of fish, some minority and low-income communities have greater exposure to, and are therefore at greater risk from, pollutants in steam electric power plant discharges.

The rule sets the first-ever national limits on the levels of toxic pollutants in wastewater that can be discharged from power plants. These standards are strong but reasonable – based on technologies that are readily available and broadly used in the industry today, reinforcing the ongoing trend towards cleaner

more modern plants. The standards provide flexibility in implementation through a phased-in approach, allowing plant owners to pursue integrated strategies to meet these and other recent environmental requirements.

Travis Loop

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